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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD DICKERSON, AND
AMY WILLIAMS,

Defendants.

CASE NO. 1:21-CR-00224-NODJ-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: September 11, 2024

TIME: 1:00 p.m.

COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on September 11, 2024.
2. By this stipulation, defendants now move to continue the status conference until November 13, 2024, and to exclude time between September 11, 2024, and November 13, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes reports, photographs, and audio files. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) The government has provided plea agreements to defendants.
 - c) Counsel for defendants desire additional time to further review discovery, discuss

1 potential resolution with their clients and the government, and investigate and prepare for trial.

2 d) Counsel for defendants believe that failure to grant the above-requested
3 continuance would deny him/her the reasonable time necessary for effective preparation, taking
4 into account the exercise of due diligence.

5 e) The parties will be prepared to set the matter for jury trial if there have been no
6 resolutions to this matter by the next status date.

7 f) The government does not object to the continuance.

8 g) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of September 11, 2024 to November
13 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
14 Code T4] because it results from a continuance granted by the Court at defendants' request on
15 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
16 best interest of the public and the defendants in a speedy trial.

17 i) The parties also agree that this continuance is necessary for several reasons,
18 including but not limited to, the need to permit time for the parties to exchange supplemental
19 discovery, engage in plea negotiations, and for the defense to continue its investigation and
20 preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 3, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ STEPHANIE M. STOKMAN
STEPHANIE M. STOKMAN
Assistant United States Attorney

Dated: September 3, 2024

/s/ SERGUEL AKITI
SERGUEL AKITI
Counsel for Defendant
GERALD DICKERSON

Dated: September 3, 2024

/s/ REED GRANTHAM
REED GRANTHAM
Counsel for Defendant
AMY WILLIAMS

ORDER

IT IS SO ORDERED that the status conference is continued from September 11, 2024, to **November 13, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **September 5, 2024**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE